

BEFORE THE POSTAL REGULATORY COMMISSION
WASHINGTON, D.C.

RANDALL EHRLICH,

Complainant,

v.

UNITED STATES POSTAL SERVICE,

Respondent.

Docket No.:

COMPLAINT

Complainant **RANDALL EHRLICH**, through attorney of record **ADAM P. KARP** of **ANIMAL LAW OFFICES**, alleges:

I. JURISDICTION AND VENUE

1. The Postal Regulatory Commission (“PRC”) has jurisdiction over this matter pursuant to, *inter alia*, 39 USC 3662(a) and 39 USC 403(c).

2. Complainant **RANDALL EHRLICH** (“Ehrlich”) resides in the City of Seattle, at 5833 7th Ave. NW, Seattle, Wash. 98107.

3. Ehrlich brings this complaint against the **UNITED STATES POSTAL SERVICE** (“USPS”), an independent establishment of the executive branch, which was created and governed by the Postal Reorganization Act, 39 U.S.C. § 101 et seq. USPS was at all times a governmental entity chartered under the laws of the United States. USPS owned and operated the USPS postal annex that employed Sonja Etta Voisine, John Bell, and Mike Fletcher. USPS maintained control

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1 and direct oversight over its employees, including Voisine, Bell, and Fletcher, and their respective
2 chains of command, and at all relevant times was responsible for adopting, implementing, and/or
3 enforcing the unlawful, unreasonable, unconstitutional, and/or discriminatory acts, omissions,
4 policies, and customs referenced herein.

5 4. **SONJA ETTA VOISINE** (“Voisine”), also known as Tonja Voisine and Sonja
6 Gasselin, is a woman residing in Kent, Washington, and was, at all relevant times, employed by
7 USPS as a letter carrier at the Ballard Postal Annex (“BPA”).

8 5. **JOHN BELL** (“Bell”) was employed by USPS as the current manager of the BPA
9 and supervisor of Voisine.

10 6. **MIKE FLETCHER** (“Fletcher”) was employed by USPS as Bell’s predecessor at
11 the BPA and supervisor of Voisine.

12 7. On August 24, 2017, Ehrlich signed an FTCA Claim Form (SF-95) seeking
13 economic and noneconomic damages based on allegations contained herein.

14 8. The USPS National Tort Center in St. Louis, Missouri, received Ehrlich’s FTCA
15 Claim on September 5, 2017 and assigned case NT 201743383 to it.

16 9. On August 23, 2018, USPS denied his claim.

17 **II. GENERAL ALLEGATIONS**

18 **Early Precedent (Hougardy)**

19 10. Peggy Hougardy resided at 5629 3rd Ave. NW, Seattle, Wash. in 2004.

20 11. Voisine was Hougardy’s letter carrier.

21 12. Voisine refused to deliver mail to Hougardy having falsely alleged that Hougardy’s
22 dog, a female yellow Labrador Retriever, showed aggressive behavior toward her. Hougardy
23 maintained her dog’s innocence to Voisine, Voisine’s supervisors at the BPA, and with the USPS
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at the State and federal levels.

13. Voisine continued harassing Hougardy, alleging that her dog was off-leash. Voisine terminated mail delivery sporadically.

14. In late 2005, Voisine caused Hougardy's mother-in-law's life insurance check to be returned to sender after having unilaterally terminated mail delivery to Hougardy's residence without notice, based on the false assertion that Hougardy's dog was out.

15. Hougardy then began taking photographs and videos of Voisine during her route delivery on Hougardy's block in order to refute these contentions.

16. Voisine reacted belligerently to being captured on video and photo. Many such images directly refuted Voisine's claims and proved her mendacity.

17. Voisine demanded that Hougardy move her mailbox to the sidewalk or forfeit mail delivery, even though Hougardy explained she had knee problems going down the stairs to retrieve the mail from where Voisine wanted the box and despite Hougardy's concerns about theft.

18. USPS Safety Advocate of Seattle Michael Offield investigated the matter. As Safety Advocate, Offield was empowered by the Seattle Postmaster to address grievances against carriers at all post offices in that district and was the ultimate decisionmaker in a conflict between a customer and carrier.

19. Offield found Voisine's allegations meritless.

20. Hougardy met with Katherine Nash, the Washington State Postmaster, and presented documentation of mail delivered late with Voisine's notations, mail that had been wrongfully held at the BPA, proof of the returned life insurance check, and photographs and videos, among other documents.

21. Not long after meeting Offield and Nash, Voisine was disciplined.

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22. Offield commanded Voisine to resume mail delivery to Hougardy. Voisine was also retrained and shadowed by another carrier.

23. In or about 2012, Voisine was taken off Hougardy's route.

Another Victim (Ehrlich)

24. Ehrlich has resided at and owned 5833 7th Ave. NW, Seattle, Wash. 98107 since 2003. Ehrlich holds a Bachelor of Arts in Psychology, pursued master's degree studies in social work, and works as a computer programmer and analyst.

25. On or about August 11, 2012, Ehrlich suffered a break-in at his residence, which he reported to Seattle Police Department under Case Number 2012-265907. This prompted concerns of mail theft should he position his mailbox at the sidewalk.

26. Ehrlich's single-family residence's front door is set back from the sidewalk by approximately 20 feet.

27. Ehrlich's mailbox is situated on his porch near the front door, where it has been located since 2003.

28. Voisine has been the designated letter carrier for Ehrlich's route for several years.

29. Before 2015, Voisine complained that Ehrlich's shrubs impeded her access to his mailbox. Ehrlich trimmed back the vegetation. When Voisine was delivering to Ehrlich, he walked outside to ask if she had enough clearance. Voisine ignored him and drove to the next block. Ehrlich walked down to talk to Voisine as she was delivering mail. She did not answer his question and was extremely rude. Ehrlich then complained that day to the USPS.

30. The next day, a Netflix DVD was delivered to his mailbox by Voisine snapped in half. Ehrlich reported this damaged mailpiece to the BPA.

31. In July 2015, Ehrlich's dog Cookie was within his residence, under his supervision.

1 The front door was open but Cookie remained behind a metal gate and firmly secured screen door.
2 Cookie barked at Voisine, who refused to deliver the mail although she faced no threat.

3 32. Within days of this incident, on or about July 20, 2015, Ehrlich received a written
4 notice from Voisine titled *Memorandum of Understanding*. It conditioned resumption of mail
5 delivery on his executing the document. Ehrlich did so.

6 33. About a week after mail delivery resumed, it shut off again, without notice, and
7 Ehrlich's mail began to be returned to sender. No notice for this second cessation of mail delivery
8 was ever given.

9 34. On July 30, 2015, Ehrlich adopted Cookie to Tanya Johnson of Puyallup, Wash.

10 35. After Cookie's adoption to Johnson, Ehrlich obtained another dog. A USPS safety
11 inspector came to his residence and met the dog, having a positive interaction. Ehrlich later learned
12 that this inspector's report had no impact on management, who did not discipline Voisine or order
13 her to resume mail delivery to Ehrlich's porch.

14 36. On or about August 12, 2015, Ehrlich contacted management at the BPA to prevent
15 his mail from continuing to be returned to sender. As an interim measure until the circumstances
16 surrounding the refusal to deliver mail to Ehrlich's residence could be discussed further, the
17 manager(s) with whom Ehrlich spoke offered to hold Ehrlich's mail at the Annex. Over the course
18 of the next approximately two years, Ehrlich's mail, which was being held (instead of delivered)
19 over Ehrlich's objection, would be returned to sender on approximately five different occasions
20 without notice to Ehrlich.

21 37. To continue and conclude the dialogue concerning the nondelivery of mail to
22 Ehrlich's residence, Ehrlich called, or caused to be called, the BPA eighteen (18) times on August
23 13, 2015, yet he obtained no further information as to why he was not receiving mail at his
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25

dwelling.

38. On August 15, 2015, Ehrlich went in person to the BPA to inquire further. He was told by Fletcher that his delivery was subject to a “Dog Hold” until he paid to move his mailbox to the sidewalk. Expressing a concern with mail theft, Ehrlich offered to mount the box away from the front door and around the corner of the house.

39. On August 17, 2015, Ehrlich called, or caused to be called, the BPA three (3) times to inquire about the status of his mail. He spoke to an employee on the last call, who told him somebody would return his phone call. This never happened.

40. On August 20, 2015, Ehrlich called, or caused to be called, the BPA seven (7) times to inquire about the status of his mail.

41. On or about August 21, 2015, Ehrlich spoke with a representative from USPS Consumer Affairs, complaining about his stopped mail.

42. Between August 21, 2015 and September 5, 2015, Ehrlich made, or caused to be made, further telephonic contacts with the BPA inquiring about his mail.

43. On September 5, 2015, Ehrlich visited the BPA about his stopped mail service. He was told to expect a call. No person called.

44. On September 8, 2015, Ehrlich called, or caused to be called, the BPA four (4) times as his mail was still being returned to sender. Ehrlich escalated the complaint to Customer Service and reiterated that Cookie was no longer in his home. Ehrlich was told that his complaint would be sent to a “higher up” to see if resolution was possible.

45. On September 10, 2015, Ehrlich completed an online form submission to the Postal Regulatory Commission, complaining about six weeks of intermittently undelivered mail, including the previous two weeks straight. A Customer Service Assistant with the PRC did not

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1 open a case for Ehrlich, or explain that he might do so, but instead provided Ehrlich with contact
2 information for Sina Taihia-Siva, the USPS Seattle District Manager of Consumer & Industry
3 Contact.

4 46. On September 10, 2015, Ehrlich contacted Taihia-Siva, expressing his concern that
5 his mail continued to be returned to sender and that supervisors at the BPA did not return his calls
6 despite promising to do so. Taihia-Siva promised to forward his complaint to the Seattle
7 Postmaster.

8 47. Taihia-Siva wrote Ehrlich that BPA Postmaster Mike Fletcher was aware of the
9 situation and would speak to a substitute carrier and contact Ehrlich by September 11, 2015 the
10 latest, and that his mail would be held, and not returned to sender.

11 48. Fletcher never contacted Ehrlich, so on September 14, 2015, Ehrlich called the
12 BPA.

13 49. On September 22, 2015, an anonymous, green note was left in the stack of mail
14 delivered to Ehrlich from Fletcher, depicting a diagram stating where his mailbox should be
15 placed, and allowing for no exceptions. Prior to this, Ehrlich had discussed with Fletcher his
16 reasons for not wanting the box right on the sidewalk. Fletcher promised to come to his home and
17 discuss the matter with him. Fletcher never did and instead kept Ehrlich's mail on hold. A true
18 copy of this note is attached as **Exhibit A**. On information and belief, Voisine authored this note.

19 50. On September 30, 2015, an anonymous, yellow note was left in the mail held at the
20 BPA, stating that his mail would be returned to sender on October 7, 2015 if no box were provided.
21 A postal worker took the note inside to show the manager, who conveyed that the note was not
22 authorized. A copy of this note is attached as **Exhibit B**. On information and belief, Voisine
23 authored this note.
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1 51. On October 9, 2015, Ehrlich realized his mail was again being returned to sender
2 as a book he ordered from Amazon said "Problem with Delivery." On this date, Ehrlich's close
3 friend Cara Quinn called USPS Consumer Affairs to complain and again request that mail not be
4 returned to sender. Quinn was told that Ehrlich would receive a call within two to three business
5 days.

6 52. On October 13, 2015, Quinn called USPS Consumer Affairs noting no return call
7 was received as promised. Again, Quinn demanded that the mail not be returned to sender. She
8 was told that someone would call in two to three business days.

9 53. On October 15, 2015, Ehrlich went to the BPA to retrieve mail that Consumer
10 Affairs assured would be on hold. The Annex employee explained that his mail was, and continued
11 to be, returned to sender. Ehrlich spoke to Fletcher, who said he only heard Ehrlich's mail was not
12 to be returned to sender on October 14, 2015. Fletcher insisted that Ehrlich move his mailbox to
13 the sidewalk.
14

15 54. As of October 19, 2015, Consumer Affairs still had not contacted Ehrlich or Quinn.

16 55. On October 20, 2015, Ehrlich went to the BPA to retrieve his mail and was told it
17 was placed on a "dog hold." An employee then lectured Ehrlich about putting his box at the
18 sidewalk or his mail would be returned to sender, regardless of whether Cookie was gone or that
19 there was a pending complaint with Consumer Affairs.

20 56. On or about October 16, 2015, desperate to reliably receive mail, Ehrlich obtained
21 a post office box. Despite this effort, Ehrlich does not believe he received all his mail and may
22 have missed important bills and letters. Ehrlich did not receive ballots to vote in the April 2017
23 special election and the August 2017 special election due to having changed his mailing address
24 back to 5833 7th Ave. NW when his mail was once again being held at the BPA.
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1 57. In Spring 2016, Fletcher left the BPA and Ehrlich's mail was returned to sender yet
2 again.

3 58. Meanwhile, in Spring/Summer 2016, Seattle Postmaster Trent McNeal told Ehrlich
4 and neighbor Mark Middlebrooks that he would conduct an OSHA investigation concerning the
5 Voisine issue and get back to him with the results. None was ever reported to them. Ehrlich
6 perceived this as an effort to meaninglessly placate and delay.

7 59. In September 2016, while delivering mail to another home a block from Ehrlich's
8 street, Voisine gestured at Ehrlich, while he was walking by, by pointing one of her hands directly
9 toward him as if it were a gun.

10 60. As of February 6, 2017, Ehrlich's mail was stopped again. That day, he filed a
11 complaint with the Postmaster General titled "Re: Issues with the mail carrier Tonja Voisine."

12 61. On or about February 14, 2017, Seattle Postmaster Trent McNeal contacted
13 customers Ehrlich, Mark Middlebrooks, and Wendy Redding to discuss Voisine. They were told
14 that Voisine's behavior would be investigated as numerous neighbors on her route had complained.
15 McNeal revealed that due to mismanagement at the BPA, almost all records of complaints (from
16 at least a dozen individuals) about Voisine, including any record of her snapping one of Ehrlich's
17 Netflix DVD's in half after he complained to one of her supervisors, went missing. McNeal also
18 admitted to many of the issues concerning Voisine's malfeasance, but said he could not take any
19 action because of the Union and that Ehrlich, Middlebrooks, and Redding did not have any
20 recordings or photographic evidence. John Bell had just begun working at the BPA at this time
21 and, on information and belief, was informed of Voisine's complained of behavior.
22

23 62. As a compromise, on or about March 29, 2017, Ehrlich mounted a second mailbox
24 on his side fence, which was approximately 10 feet 6 inches from the sidewalk. This gesture did
25

not satisfy Defendants.

63. On April 3, 2017, Ehrlich contacted Bell, along with Middlebrooks, another alleged victim of Voisine, complaining of the continued lack of accountability concerning Voisine's threats and fabrications of complaints against her customers without management verification. During this conversation, the Union representative Tyson Burchak was also present. Despite the concerns related by Ehrlich and Middlebrooks, Bell and Burchak refused to address Voisine's behavior or ensure that she would not be a threat to Ehrlich or his animals. They would not even acknowledge that there was any investigation of her threat or false complaints made about Ehrlich. When he returned home, he found a bagel in his back yard, which his dogs had partially eaten and was not Ehrlich's.

64. Ehrlich reported the "finger gun" and bagel incidents to Seattle Police Department in April 2017 under case number 2017-115475.

65. On information and belief, Voisine's romantic partner is an employee of USPS at the BPA.

66. On April 13, 2017, Ehrlich contacted the Postmaster General via letter titled, "Re: Issues with the mail carrier Tonja Voisine."

67. On or about April 15, 2017, a neighbor mentioned specific details about Ehrlich's grievances with Voisine and began to antagonize him. Those details could not have been known had Voisine or other USPS employees not disseminated this information to other customers. On further information and belief, Voisine discussed her interactions with Ehrlich with more than one individual, who, in turn, harassed Ehrlich.

68. Still having no relief, on May 8, 2017, Ehrlich for a third time contacted the Postmaster General in a letter titled, "Re: Issues with the mail carrier Tonja Voisine."

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1 69. On May 18, 2017, Bell wrote Ehrlich that if he did not move his mailbox to the
2 sidewalk or establish another delivery address, his mail would be returned to sender starting May
3 28, 2017.

4 70. On September 22, 2019, an individual broke into Ehrlich's mailbox positioned on
5 the fence, rifling through it for items to steal. Ehrlich reported this to the police department as part
6 of incident 19-354907. For legitimate reasons contained herein, Ehrlich refuses to move his
7 mailbox. He has suffered and continues to suffer returned mail as threatened by Bell.

8 71. Not long after the federal lawsuit was filed and served on Voisine, Ehrlich found
9 cans of opened cat food on his property, near the sidewalk. Fearing they were poisoned, he
10 discarded them. In February 2018, Ehrlich again found opened tins of cat food in his backyard,
11 which deeply concerned Ehrlich for he fears they are tainted and intended harm to his dog. On
12 March 11, 2018, Ehrlich found yet more cans of cat food outside the front of his home. On
13 information and belief, Voisine has left cans of cat food on other people's lawns. In October 2018,
14 Ehrlich continues to find cans of cat food at or on his premises. As recently as December 2019,
15 Ehrlich found yet more cans of cat food at or on his premises.
16

17 72. For over a year, Voisine has parked her work vehicle directly across from Ehrlich's
18 driveway (she parks in front of 5832 7th Ave. NW and Ehrlich resides at 5833 7th Ave. NW), a
19 pattern of behavior he finds intimidating and purposeful. Though she could easily park anywhere
20 else on the block, she continues to situate herself in his view.

21 73. Ehrlich incorporates by reference the declarations of Randall Ehrlich and Scott
22 Lucas dated December 6, 2018, filed with the PRC in C2019-1; and the statements and declarations
23 of Peggy Hougardy, Jeanne McGrady, Urban Waite, Karen Leung-Waite, Wendy Hamal Redding,
24 Tracy Redding, India Ornelas, Jeremiah Winghart, Jim Ratti, Valerie Capon, Ryota Akamine,
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1 Kimberly Arrow, Matthew Leonard, Erika Middlebooks, Mark Middlebrooks, Melissa Lynn,
2 David Barnes, Jacqui Barnes, Stacia Valley, and anonymous individuals as more fully described
3 in the *Karp Declaration* filed with the PRC on December 7, 2018 in C2019-1. These documents
4 support the contentions of Voisine's assault, harassment, unreasoning ultimatums, damage to
5 private property, and other wrongful acts.

6 74. On information and belief, the BPA has received an inordinate number of
7 complaints against Voisine, including a petition to reassign her to a different route. Despite
8 management's awareness of Voisine's alleged mendacity, anger mismanagement, and fraudulent
9 behavior, no action has been taken to rectify the myriad grievances of Ehrlich and other customers.

10 75. Ehrlich has also incurred the costs of post office box rental and mileage to same
11 since approximately October 16, 2015.

12 76. Fletcher knew or should have known of Voisine's unlawful, unreasonable, and
13 unconstitutional behavior, described herein, yet failed to take, on information and belief, any
14 disciplinary action against her, instead condoning same, and furthering the harms inflicted upon
15 Ehrlich.
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17 77. Bell knew or should have known of Voisine's unlawful, unreasonable, and
18 unconstitutional behavior, described herein, yet failed to take, on information and belief, any
19 disciplinary action against her, instead condoning same, and furthering the harms inflicted upon
20 Ehrlich.

21 78. Ehrlich intends to conduct discovery into all records possessed by the BPA relating
22 to complaints against Voisine, and the maladministration of them by Bell, Fletcher, and other
23 postmasters.
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25 **III. ISSUES PRESENTED RELATED TO COMPLAINT**

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1 79. Ehrlich's counsel, Adam P. Karp, filed a federal lawsuit against the USA, USPS,
2 Voisine, Bell, and Fletcher in *Ehrlich v. USA, et al.*, USDC of W.D.Wash., 2:17-cv-01245-RAJ.
3 On July 26, 2018, the court dismissed his action, where he sought injunctive and declaratory relief,
4 among other remedies, claiming lack of jurisdiction and noting that only the PRC could hear his
5 case.

6 80. To date, except for extremely infrequent exceptions, Ehrlich does not get mail at
7 his street address. Such mail is returned to sender.

8 81. To date, Ehrlich continues to endure inconvenience, mental anguish, interference
9 with enjoyment of life and medical treatment arising from the acts and omissions of the foregoing
10 defendants related to, inter alia, harassment, intimidation, property destruction, and the
11 inappropriate dominion and control over his mailpieces and parcels.

12 82. Ehrlich seeks the strongest reprimand possible from this Commission compelling
13 the immediate resumption of mail delivery to Ehrlich's mailbox as presently installed on his porch.
14 Indeed, given her history of recalcitrant and abusive behavior, the PRC should take yet stronger
15 action and urge her termination.
16

17 **IV. PERSONS KNOWN OR BELIEVED TO BE SIMILARLY SITUATED BY THE**
18 **ISSUES INVOLVED IN THE COMPLAINT and**
NATURE OF EVIDENTIARY SUPPORT

19 83. Persons similarly situated to Ehrlich, but who enjoy residential mail delivery,
20 include customers with well-behaved dogs and any other resident whose premises present no
21 dangers to the letter carrier. One such individual is neighbor Lisa Sorensen, who owned a dog.
22 When interviewed on television in 2017, she stated, "And we've tried to stay on the good side, to
23 be honest, to keep getting mail." Other individuals are ascertainable.
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84. On December 10, 2019, the United States Court of Appeals for the D.C. Circuit suggested that the foregoing allegations of similarly situated individuals would present a plausible § 403(c) discrimination claim. *See Ehrlich v. PRC*, D.C. Cir. 19-1004, at fn1.

V. ISSUES PRESENTED ARE NOT PENDING OR HAVE NOT BEEN RESOLVED IN ANY OTHER FORUM OR AN EXISTING COMMISSION PROCEEDING

85. More than reasonable efforts have been taken to resolve these issues by direct communication with the parties, including extensive dialogue between Ehrlich and various postal representatives (see attached and above), as well as Mr. Karp and Kristin B. Johnson, Assistant Attorney General in the *Ehrlich* suit, and Mr. Karp and USPS General Counsel Thomas Marshall following Mr. Karp's September 18, 2018 letter.

VI. PRAYER

WHEREFORE, Ehrlich requests that the Commission order and direct:

A. That mail service be restored to Ehrlich's premises by delivery to the mailbox at his front door;

B. That all discriminatory acts and omissions against Ehrlich cease immediately; and

C. For such other and further relief as the Commission may deem just and proper.

VII. CERTIFICATION

I certify that reasonable attempts have been made to the USPS General Counsel by letter or demand as shown in **Exhibit C**, for which such complaints and demands have been ignored or for which no response has been forthcoming.

Dated this December 23, 2019.


ANIMAL LAW OFFICES

/s/ Adam P. Karp

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Adam P. Karp, WSB No. 28622
Attorney for Complainant Ehrlich

PROOF OF SERVICE

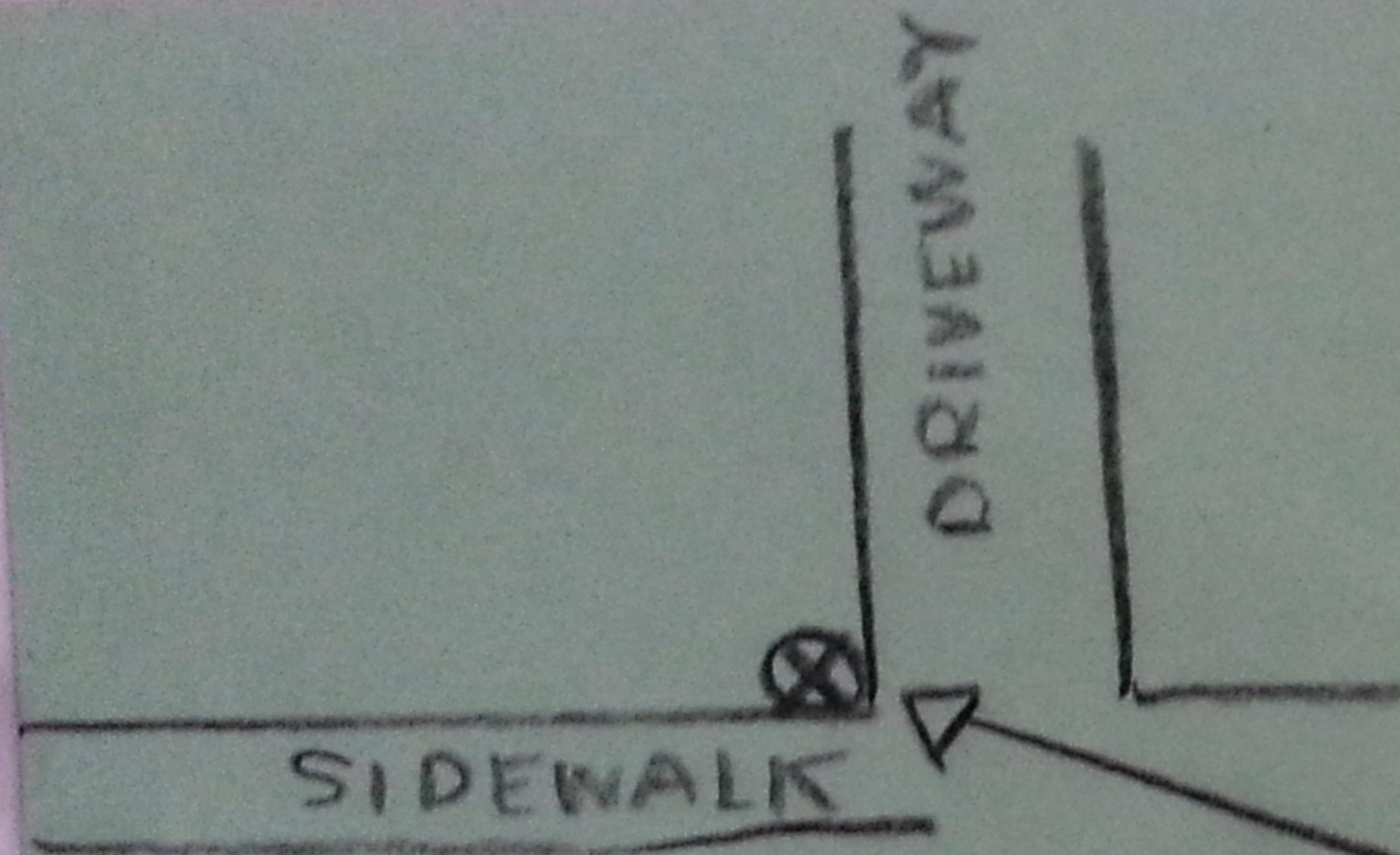
I certify that the foregoing has been served upon the USPS per 39 CFR 3030.11 by
emailing same to prccomplaints@usps.gov on the date below signed.

Dated this December 23, 2019.

ANIMAL LAW OFFICES


Adam P. Karp, WSB No. 28622
Attorney for Complainant Ehrlich

A



BOX GOES RIGHT HERE.
NO EXCEPTIONS.

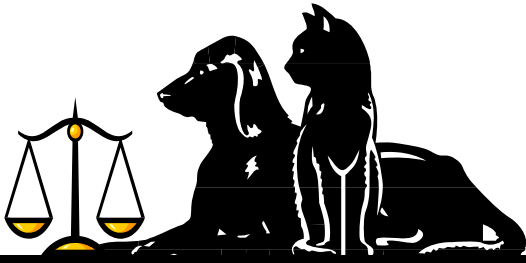
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LAST MAIL
PICK-UP WAS
SEP 26. POLICY IS

10 DAYS TO
PUT UP MAILBOX
AT SIDEWALK
LOCATION.

MAIL WILL BE
RETURNED ON
7 OCT IF NO BOX
IS PROVIDED. THIS
IS ON-GOING SINCE
JULY.

C



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OF ADAM P. KARP, JD, MS**

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Licensed in Washington, Oregon, and Idaho

By Certified Mail – Return Receipt Requested
Tuesday, September 18, 2018

General Counsel Thomas Marshall
United States Postal Service
475 L'Enfant Plz. SW
Washington, DC 20260-1100

RE: *Ehrlich* | USPS
Meet-and-Confer Attempt under 39 CFR 3030.10(a)(9)

Dear Mr. Marshall,

I represent Randall Ehrlich, who, along with several other postal customers, has suffered in the myriad and ongoing ways described in the attached proposed *Second Amended Complaint*, filed in federal district court in Seattle and since dismissed due to the court's assertion of lack of jurisdiction. While Mr. Ehrlich disputes Judge Jones's reasoning, he has not appealed it and instead seeks relief through the PRC. Although after reading the complaint, I am sure you can understand why Mr. Ehrlich considers taking this step of contacting your office to be futile and inadequate based on the multi-year history of contacting managers at the Ballard Postal Annex, the Seattle Postmaster, and the Postmaster General. Yet, he had me contact you in an abundance of caution without waiving his right to initiate a PRC complaint at any time. Mr. Ehrlich was exceedingly patient waiting nearly six months for Judge Jones to rule and is not sanguine about waiting much longer for relief. Accordingly, I ask that you please give priority to this request. If there is any way to resolve the matter short of litigation before the PRC, please contact me at your earliest convenience, but in no event later than twenty (20) days from the date of this correspondence. If I can share any additional documentation for your consideration, email me for promptest response.

Respectfully,

ANIMAL LAW OFFICES

Adam P. Karp, Esq.
Cc: Randall Ehrlich